

# **EXHIBIT M**

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

DELTON GOODRUM

Plaintiff,

V.

CITY OF ALEXANDRIA, a municipal.  
Corporation of Virginia

Defendant.

Case No. 1:24-cv-01111 (PTG/WEF)

## DECLARATION OF EDWARD MILNER

I, Edward Milner, declare as follows:

1. My name is Edward Milner.
2. I am over the age of eighteen (18) and have personal knowledge of the facts declared within.
3. I began work with the Alexandria Police Department in May 1996 and am currently retired. Lt. Goodrum began his employment with the Department several months after me and I have known him since then.
4. I attended the Lieutenants' meeting on June 30, 2021 wherein Chief Hayes announced he was promoting Lt. Delton Goodrum to the position of Captain.
5. Chief Hayes supported his decision with discussion of race, giving the additional impression that he intended to promote Lt. Goodrum because he is Black.
6. I was not on the list of candidates eligible for promotion to Captain that was operative at the time of that meeting.
7. I took offense to Hayes' statements as they reflected an intent to promote individuals at the Department based on their race moving forward.
8. Lt. Goodrum grew up in Alexandria. In my experience, city leaders, restaurant owners, and business owners recognized and appreciated Lt. Goodrum within the community.

9. Before Chief Hayes resigned, I witnessed him create a new Captain position for Jason North (white) and promote him to that position.
10. I know Jason North to have significantly less experience than Lt. Goodrum and believe Lt. Goodrum is far more qualified to serve as a Captain.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 24, 2025.

A handwritten signature in dark ink, appearing to read 'Ed Milner', written over a horizontal line.

Ed Milner